

# **Exhibit 2**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

UMG RECORDINGS, INC., et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	No. 1:17-cv-00365-DAE
GRANDE COMMUNICATIONS	)	
NETWORKS LLC,	)	
	)	
Defendant.	)	

**DECLARATION OF JOHN FEEHAN IN SUPPORT OF DEFENDANT’S MOTION FOR  
STAY OF EXECUTION OF JUDGMENT AND FOR WAIVER OF BOND**

I, John Feehan, declare and state as follows:

1. I am the Chief Financial Officer of Astound Broadband (“Astound”), which is the current trade name of Defendant Grande Communications Networks LLC. I submit this declaration in support of Grande’s Motion for Stay of Execution of Judgment and for Waiver of Bond.

2. Grande is part of a collective of broadband operators that now operate under the name Astound Broadband.

3. Viewing the Astound entities collectively, Astound is the sixth largest cable provider in the U.S. In 2020, the then-existing Astound entities were acquired by a private equity firm named Stonepeak Infrastructure Partners for \$8.1 billion. Exhibit A is a true and correct copy of a press release of that acquisition.

4. In June 2021, certain assets of WOW! Internet, Cable & Phone were added to the Astound portfolio for \$661 million. Exhibit B is a true and correct copy of a press release of that acquisition.

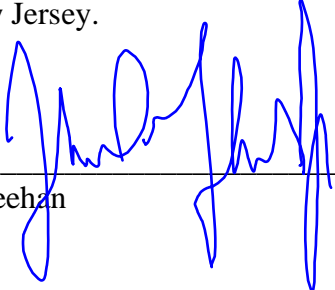
5. Exhibit C (filed under seal) is a true and correct copy of Astound Broadband's 5-year plan, which was presented to the Radiate HoldCo, LLC Board of Directors in December 2022. Grande is a wholly owned subsidiary of Radiate HoldCo, LLC.

6. Exhibit D (filed under seal) is a true and correct copy of Radiate HoldCo, LLC's Q3, 2022 Management Discussion and Analysis (MD&A), which analyzes the 2022 performance of the Astound entities.

7. Exhibit E (filed under seal) is an Amendment to a Credit Agreement which outlines a \$455 million revolving line of credit for the Astound entities (as represented by parent companies). The Astound entities can borrow from that revolver until at least 2025, and there is no event that would trigger the loss of that revolver.

8. I have been involved in the process of investigating the cost of a supersedeas bond. The total cost of securing a bond for the full amount of the current judgment would be approximately \$4 million per year.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct. Executed on March 9, 2023, in Princeton, New Jersey.

/s/   
John Feehan